

EXHIBIT A  
(Proposed Order)

1  
2  
3  
4  
5  
6  
7  
8 **UNITED STATES BANKRUPTCY COURT**  
9 **EASTERN DISTRICT OF WASHINGTON**

10 In re:

11 GIGA WATT, Inc., a Washington  
12 corporation,

13 Debtor.

Case No. 18-03197 FPC 11

The Honorable Frederick P. Corbit

14 **ORDER GRANTING MOTION OF**  
15 **THE CHAPTER 11 TRUSTEE FOR**  
16 **AN ORDER (I) APPROVING ML**  
17 **AND EDH SETTLEMENT AND**  
18 **GRANTING RELATED RELIEF**  
19 **AND (II) SHORTENING TIME**  
20 **THEREON**

21 This matter came to be heard on the *Motion of the Chapter 11 Trustee for*  
22 *an Order (i) Approving ML and EDH Settlement and Granting Related Relief and*  
23 *(ii) Shortening Time Thereon* (the “Motion”) on October 6, 2020 at 10:30 a.m.  
24 (the “Hearing”). Unless otherwise defined herein, capitalized terms have the  
25 meanings ascribed to them in the Motion. The Court has considered the Motion  
and the declaration and memorandum filed in support of the Motion and any

---

[Proposed] Order Granting Chapter 11  
Trustee’s Motion for Order (i) Approving  
ML and EDH Settlement, etc. - Page 1

---

1 objection(s) thereto. The Court has also completed the Hearing. This Order is  
2 based upon the Motion, the record before the Court, any testimony and arguments  
3 made and heard at the Hearing, and the filings with the Court. The Court stated its  
4 findings of fact and conclusions of law at the Hearing and those findings of fact  
5 and conclusions of law are incorporated herein by reference as if set forth fully  
6 herein as provided in Rule 7052, applicable hereto by Rule 9014(c).

7 ACCORDINGLY, IT IS HEREBY ORDERED THAT THE MOTION IS  
8 GRANTED AND IT IS FURTHER ORDERED THAT

9 1. The Settlement Agreement and the Settlement contained therein are  
10 approved.

11 2. The Trustee is authorized to enter into the Settlement Agreement and  
12 to perform pursuant to its terms.

13 3. This Order shall be effective immediately upon entry onto the  
14 Court's docket.

15 ///END OF ORDER///  
16  
17

18 **PRESENTED BY:**

19 Pamela M. Egan, Esq.  
20 Potomac Law Group PLLC  
21 1905 7<sup>th</sup> Ave. W  
22 Seattle, WA 98110  
23 Tel.: 415-297-0132  
24 Email: [pegan@potomaclaw.com](mailto:pegan@potomaclaw.com)

25 *Attorneys for Mark D. Waldron, as Chapter 11 Trustee*

---

23 [Proposed] Order Granting Chapter 11  
24 Trustee's Motion for Order (i) Approving  
25 ML and EDH Settlement, etc. - Page 2

---